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Comments: Dear Forest Supervisor Jackson,

Thank you for this opportunity to comment on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Stibnite Gold Project (SGP), proposed at the headwaters of the South Fork Salmon River watershed. As proposed, this project represents unacceptable risks to Chinook salmon and bull trout, will negatively impact all forms of recreation within the area, and harms treaty reserved rights and interests of the Indigenous peoples of the area.

The SGP will have adverse effects on Chinook salmon and bull trout. Given the billions of dollars spent on Snake River salmon recovery, this project represents a severe risk and flies in the face of this investment and effort to restore these species to a sustainable population. Stream temperatures are predicted to be elevated for up to 100 years within the mine site boundary and the habitat for these sensitive species will be for the worse, not better, as a result of this project. Especially now, as real policy movement in the direction of removal of the Lower Snake River Dams occurs, we cannot allow assessment of threat to wild fish be isolated only to a small land area, when the nature of rivers is such that downstream effects are not just possible, but certain.

As proposed, this project will result in the loss of over 120 acres of high-functioning wetlands. It will negatively impact the general water quality of streams found within the site from additional sedimentation and the potential release of additional contaminants mobilized by mining and construction.

Although Perpetua prefers to present the SGP as a 'restoration' project, it is a massive industrial mine that will leave the landscape unrecognizable and degraded for lifetimes to come through the creation of three open pits, the permanent storage of over 120 million tons of toxic mine tailings above previously undisturbed wetland habitat, and an expanded footprint that more than doubles the previous disturbance of the Stibnite mining district.

The effects of climate change will exacerbate the impacts the SGP will have on the environment and were inadequately incorporated into the SDEIS. While briefly acknowledged, the compounding impacts of a warming climate were not taken into consideration when predicting stream temperatures or other environmental impacts that are intrinsically linked to the climate.

Throughout the life of the mine, hazardous materials will be transported to the site through the communities of Valley County, but there are no risk analyses on local communities if a hazardous spill were to occur and the potential exposure of a hazardous spill is much larger than the SDEIS portrays and must be addressed by the Forest Service.

As proposed, the SGP raises numerous concerns for rivers protected under the Wild and Scenic Rivers Act (WSRA). The project itself is located at the headwaters of the suitable South Salmon River, which feeds directly into the designated Main Salmon River. However, the scope of analysis does not include any potential impacts that extend downstream of the site boundary to review these sections of river. Additionally, Johnson Creek and Burntlog Creek, both eligible under the WSRA, will both face degradation and risk of a catastrophic toxic spill if this project moves forward.

Recreation, in any form, within the general area of the mine will be negatively impacted. The analysis of impacts on recreation is arbitrarily limited to a 5-mile radius from major mine features and does not include any discussion of traffic displaced to the South Salmon Road and Lick Creek Road that will logically result from this project. As a lifelong Idahoan, avid recreationist, and whitewater guide, many of the locations that will certainly or possibly be

impacted by this project are near and dear to me and my sense of what it means to come from Idaho. The Salmon River and its tributaries are unique and represent the Idaho wilderness ethic. Additionally, I know personally the community of humans who come together around this precious resource, navigating differences to live adjacent to and protect the river. Wilderness tourism and recreation is also a high dollar industry in Idaho, one that supplies many jobs to Idahoans and brings positive attention to our state. This project will jeopardize that source of income, enjoyment and Idaho heritage for thousands of people.

The SGP will negatively impact the treaty-reserved rights of the Nez Perce and other indigenous peoples of Idaho. The SDEIS clearly states that "Adverse impacts to tribal rights and interests under either alternative, including preventing access to traditional lands, harming traditional fishing and hunting rights, impacting endangered salmon and concerns that it would harm the tribe's salmon restoration efforts".

All of these risks will be taken on in order to extract minerals not even in high need. Gold is not in need in the United States for any utilitarian purpose. While antimony will also be extracted, there are known substitutes for the primary use of antimony. Additionally, antimony can be extracted without the destructive conditions necessary for gold extraction, which Perpetua proposes using. There is no justifiable reason for the combination of type and scale of mine being proposed.

The DEIS and SDEIS for the Stibnite project fail to address critical environmental and economic issues and do not adhere to Treaty Law, the Clean Water Act, the Endangered Species Act, or the Boise and Payette Forest Land Resource Management Plans. For these reasons, I urge the Forest Service to protect the Salmon River watershed and reject the proposed Stibnite mine plan.

Best,  
Hallie Holland